

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: :  
Christina Santiago : Chapter 13  
: Case No.: 18-14001 - AMC  
Debtor(s) :  

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**MOTION FOR AUTHORITY TO SELL REAL PROPERTY**

Debtor, Christina Santiago, by and through her undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtor commenced the instant Chapter 13 matter on June 15, 2018 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on December 12, 2018.
3. The subject real property is located at 648 Osborne Avenue, Morrisville, PA (hereinafter referred to as "the property") and is owned by the Debtor.
4. Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Carl James DeNovio with Long and Foster Real Estate.
6. On or about June 29, 2022, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$332,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit "A."**
7. The settlement date for the sale of the subject property is scheduled for August 11, 2022.

8. The Buyers, Annekay Patrice and Delroy Snow, are not insiders of the Debtor and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds, Debtor intends to satisfy the mortgage(s) held by MidFirst Bank, along with any other liens on the property.

10. Debtor is desirous of receiving her full exemption in the sum of up to \$25,150.00 plus any remaining proceeds after all liens and the entire Chapter 13 Balance is satisfied.

**WHEREFORE**, Debtor respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the debtor such other and further relief to which they may be justly entitled.

Dated: July 1, 2022

/s/Brad J. Sadek, Esq.  
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